

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION

YAHYA (JOHN) LINDH,)	
)	
Plaintiff,)	
)	
v.)	No. 2:14-CV-00142 JMS-WGH
)	
WARDEN, FEDERAL CORRECTIONAL)	
INSTITUTION, TERRE HAUTE)	
INDIANA, in his official capacity,)	
)	
Defendant.)	

First Set of Interrogatories to Defendant

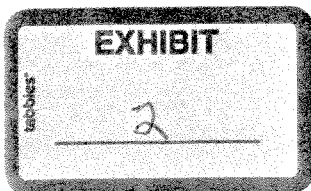
Plaintiff, by counsel, requests that defendant respond to the following Interrogatories as required by Rule 33 of the Federal Rules of Civil Procedure. These interrogatories are designed to obtain information to be used by plaintiff in support of his request for class certification in this cause and plaintiff reserves the right to seek further information through interrogatories in the future as to the merits of this action.

1. At the current time how many prisoners are confined to the Communications Management Unit ("CMU") at the Federal Correctional Institution, Terre Haute, Indiana?

RESPONSE:

2. Since January 1, 2013, how many prisoners have been transferred into the CMU?

RESPONSE:



3. Of the prisoners currently in the CMU, how many have received a least one social visit while in the CMU?

RESPONSE:

4. In his Declaration of September 16, 2014, filed along with Defendant's Opposition to Class Certification, Deputy Captain Vincent Rigsby utilizes the term "social visit." Please define what is a "social visit."

RESPONSE:

5. Since January 1, 2013, how many prisoner in the CMU have had at least once social visit?

RESPONSE:

Kenneth J. Falk

Kenneth J. Falk
No. 6777-49

Gavin M. Rose

Gavin M. Rose
No. 26565-53
ACLU of Indiana
1031 E. Washington St.

Indianapolis, IN 46202
317-635-4059
Fax: 317-635-4105
kfalk@aclu-in.org
grose@aclu-in.org

Attorneys for Plaintiff and the Putative Class

Certificate of Service

I hereby certify that on this 30th day of September, 2014, a copy of the foregoing was served by first class U.S. mail and by e-mail on the following person(s):

Thomas Kieper
Assistant United States Attorney
10 W. Market St.
Indianapolis, IN 46204
tom.kieper@usdoj.gov

Jonathan Bont
Assistant United States Attorney
10 W. Market St.
Indianapolis, IN 46204
jonathan.bont@usdoj.gov

s/ Kenneth J. Falk
Kenneth J. Falk
Attorney at Law